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County of Lexington

MAY 20 1993

FEDERAL COMMUNICATIONS COMMISSION

County Administrator
OFFICE OF THE SECRETARY

212 South Lake Drive

Lexington, South Carolina 29072

May 7, 1993

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FCC MAIL ROOM

Federal Communications Commission
1919 M Street, Suite 222
Washington, DC 20554

ATTENTION: FCC Docket 92-235
Spectrum Refarming

To The Commission:

Lexington County, South Carolina, appreciates the opportunity to provide comments on the above referenced docket. We realize the development of proposed rules on spectrum refarming was a massive undertaking brought about by the shortage of frequencies in some areas of the country. However, we feel the proposed rules go too far, too quickly, and as a result, if implemented, could seriously jeopardize our Public Safety and local government communications network.

In addition the financial impact could be so substantial, so quickly, as to undermine the fiscal integrity of our county government. With continued divestiture of responsibility for Human Services by the state and federal governments, and the subsequent passing of the burden for this service delivery to local government, any other significant burden to our taxpayers would be disastrous.

Other concerns about the proposed rules include suggested channel bandwidths, non Public Safety channel allotments in bands otherwise dedicated to Public Safety, power and height limitations of transmitter sites, and frequency coordination.

It is our understanding that Commission staff no longer plan to require existing licenses to split their channels or to reduce deviation by 1996, as was published in the proposed rule. Lexington County opposes any short term goal that would require a specific time frame for this process.

Rather we urge consideration of the Association Public Safety Communications Officers (APCO) proposal for a gradual reduction in bandwidths for current users in all bands below 512 MHz, with a channel plan that would allow for (but not yet require) a smoother migration to even more narrower bandwidths, at some future point (i.e. 25 kHz to 6.25 kHz). This approach would negate the need to buy new radio equipment before the normal life cycle of our existing equipment.

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Power and height limits of transmitter sites also cause us a great deal of concern. Lexington County covers approximately 740 square miles, with a population of about 170,000 people. The terrain has substantial elevation deviations across this 740 square miles. If height and power limits are reduced substantially, the county could be forced to erect up to six additional sites at a substantial cost to the local taxpayer.

We again support APCO's proposal to allow frequency coordinators to limit power and tower height levels to that which is necessary to provide a specified signal level at the edges of a licensee's